

CARTER LEDYARD MILBURN

MEMO ENDORSED

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May 10, 2021

VIA ECF

The Honorable Nelson S. Román
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

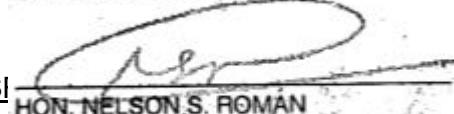
Oral argument is discretionary. If the Court decides to hold argument, argument will be scheduled. If Jacob Rosner seeks to amend his pending motions to reflect the superseding indictment, he can raise that issue during his arraignment on the superseding indictment. The Clerk of Court is directed to terminate the motion at ECF No. 243.

Dated: May 10, 2021
White Plains, NY

Re: United States v. Jacob Rosner, Ind. No. 19-CR-497 (NS)

Dear Judge Román:

SO ORDERED:


HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

I represent Jacob Rosner in the above-captioned case. I write to respectfully request oral argument on Jacob's pending pre-trial motions to dismiss the indictment and to compel a bill of particulars.

This case, involving a statute *rarely* deployed to bring criminal charges - the International Parental Kidnapping Act (IPKCA) - and presenting highly unusual facts, is one in which oral argument has significant potential to aid the Court. While the parties have briefed the issues, the briefs are voluminous and oral argument will require the parties to synthesize their arguments to their essence.

Oral argument also provides an opportunity to explain why the recently filed superseding indictment does not cure the defects identified in the pending motion to dismiss, nor supply the requested particulars whose production we seek to compel. Accordingly, I respectfully request that the Court schedule oral argument on the pending pre-trial motions.

Respectfully submitted,

/s/ Alan S. Lewis

ASL:MJE